

BLUMENFELD & COHEN

SUMNER SQUARE
1615 M STREET, N.W. SUITE 700
WASHINGTON, D. C. 20036

202 955-6300

FACSIMILE 202 955-6460

<http://www.technologylaw.com>

JUL - 9 1998

4 EMBARCADERO CENTER
SUITE 1170
SAN FRANCISCO, CA 94111

415 394-7500
FACSIMILE 415 394-7505

July 9, 1998

VIA MESSENGER

Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: CC Docket No. 94-102
Notice of Ex Parte Communication

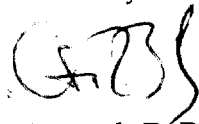
Dear Ms. Salas:

On Thursday, July 9, 1998, Ellen Monheimer Kirk of SnapTrack, Inc., Philip Maher, a consultant to SnapTrack, Inc., and Glenn B. Manishin and the undersigned counsel of this firm, met with John Cimko Jr., Chief, Policy Division, and Nancy Boocker, Daniel Grosh, Won Kim, and Barbara Reideler of the Commission's Wireless Telecommunications Bureau.

The meeting participants discussed test results of SnapTrack's technology for locating wireless handsets. At the meeting, SnapTrack distributed the enclosed documents.

Pursuant to Section 1.1206 of the Commission's Rules, two copies of this letter are enclosed for filing. Please contact me if you have any questions regarding this matter.

Sincerely,



Kenneth R. Boley

cc: John J. Cimko, Jr., WTB
Enclosure

No. of Copies rec'd 041
FACODE

SnapTrack Field Tests
February 23-26, 1998
Results summary chart

Location	Garmin Results	SnapTrack Single Sample Results						SnapTrack 5 Sample Averaging Results					
		Fixes	Attempts	Percent Yield	1 sigma 68.3% CEP meters	2 sigma 95% CEP meters	Max Error meters	Fixes	Attempts	Percent Yield	1 sigma 68.3% CEP meters	2 sigma 95% CEP meters	Max Error meters
Indoor, 2 story residence (wood frame) 3707 W 98th place, 1st floor interior hall	no fix	106	106	100%	21	35	72	102	102	100%	19	27	28
Indoor, 2 story residence (wood frame) 3707 W 98th place, center of basement	no fix	33	33	100%	20	*	60	29	29	100%	13	*	21
Indoor, 2 story residence (wood frame) 627 Marine, center of basement	no fix	36	37	97%	16	*	50	33	33	100%	12	*	18
Indoor, 2 story office building (Brick) 2045 Broadway, 2nd floor interior hallway	no fix	110	110	100%	17	36	66	106	106	100%	11	19	25
Indoor, 2 story office building (Brick) 2045 Broadway, 1st floor interior room	no fix	34	36	94%	22	*	79	32	32	100%	13	*	25
Indoor, Shopping Mall Westminster Mall, Denver	no fix	27	27	100%	36	*	133	23	23	100%	22	*	35
Indoor, Shopping Mall Aurora Mall, Aurora (Denver)	no fix	31	39	79%	44	*	168	35	35	100%	41	*	122
Indoor, 50 story office building (Glass/Steel) 1801 California, 21st Floor 4.4 m from window	no fix	32	36	89%	84	*	231	32	32	100%	82	*	104
Outdoor, urban canyon street level (mid block) Curtis street between 16th and 17th, Denver		120	120	100%	45	113	247	116	116	100%	37	55	97
(Supplemental reference sites)													
Outdoor, urban canyon Parking Garage Roof		57	57	100%	18	*	47	54	54	100%	10	*	30
Outdoor, open site 71st and Winchester Circle		16	16	100%	4	*	5	**	**	**	**	*	**

* Insufficient data to calculate 2 sigma value

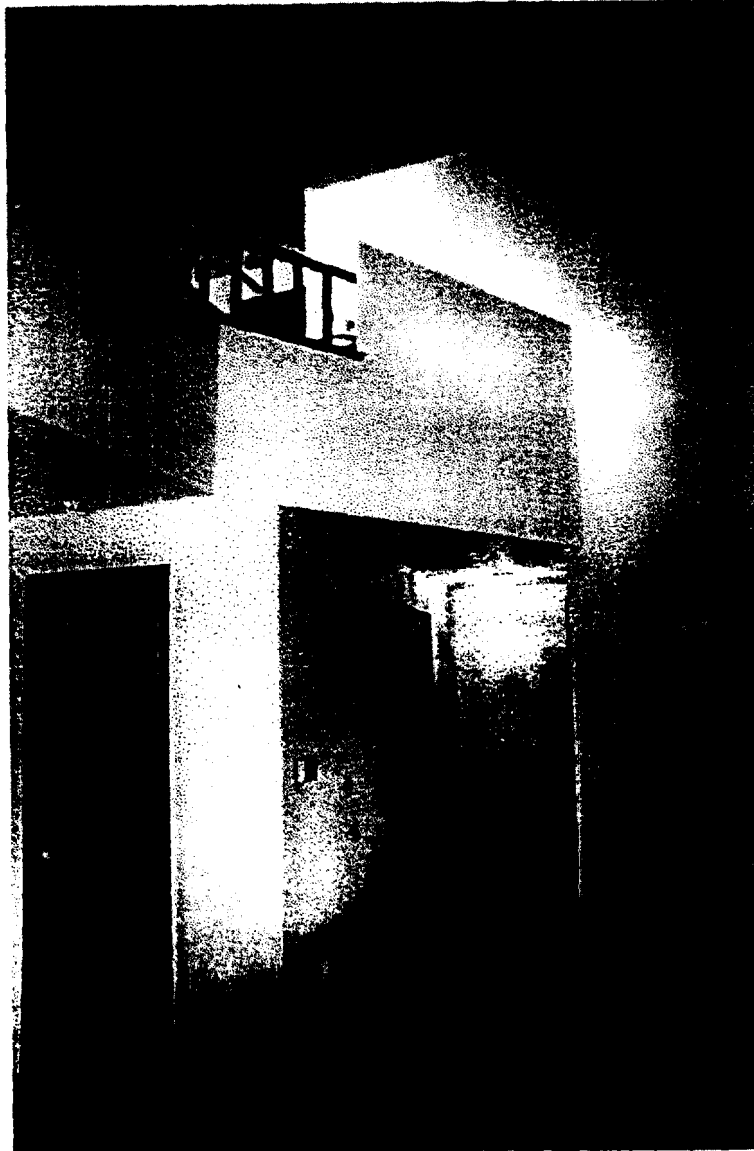
** 5 Sample average not calculated



Indoor, 2-story residence (wood frame)

Photograph: exterior view

Location: 3707 West 98th Place, Westminster (Denver)



Indoor, 2-story residence (wood frame)

Photograph: Test Location #1, 1st floor interior hall
Location: 3707 West 98th Place, Westminster (Denver)

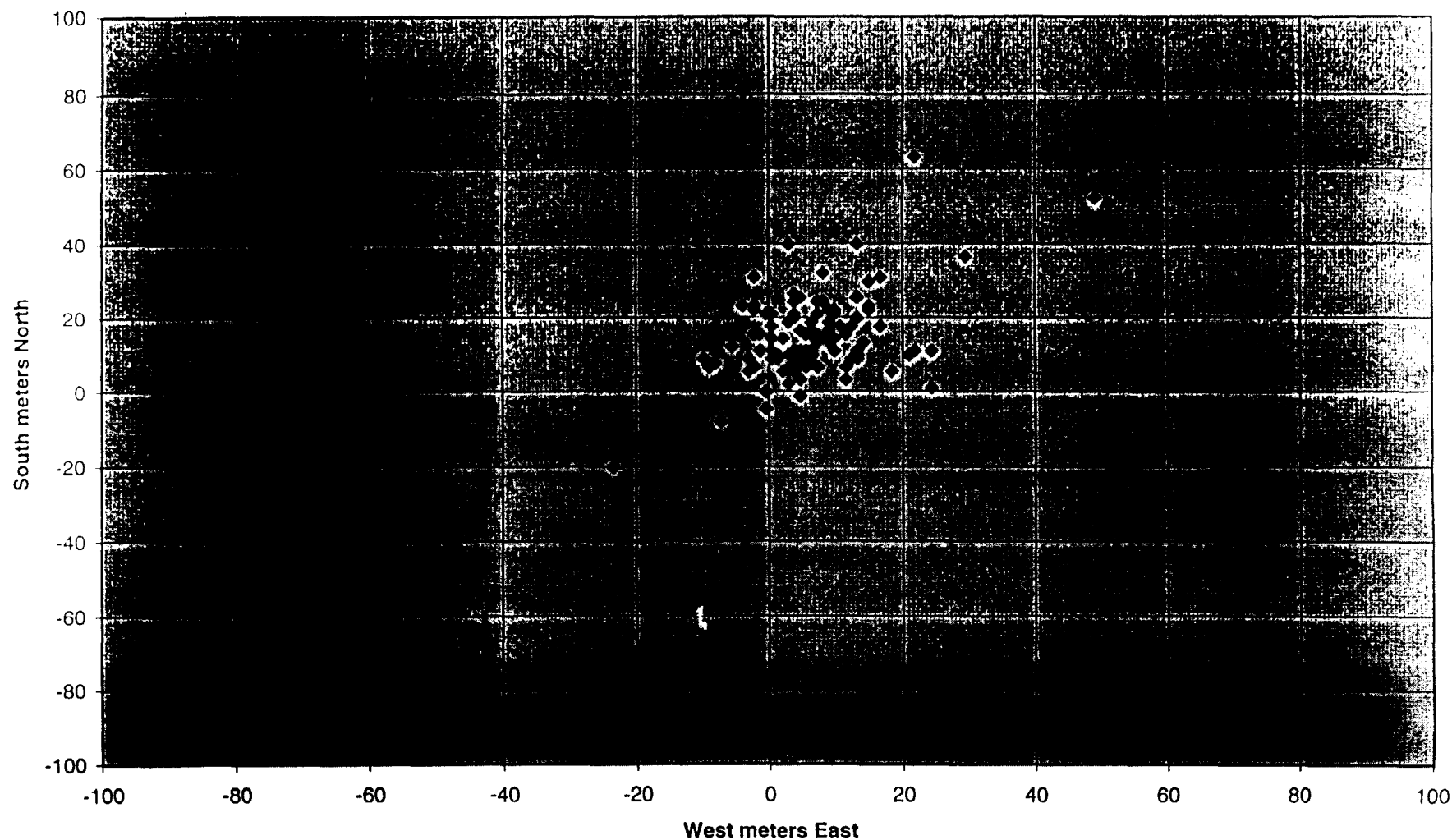
Indoor, 2 story residence (wood frame)
3707 W 98th place, Westminster (Denver)
Test location #1, 1st floor interior hall

Single fix results

Yield: 106 of 106 (100 %)

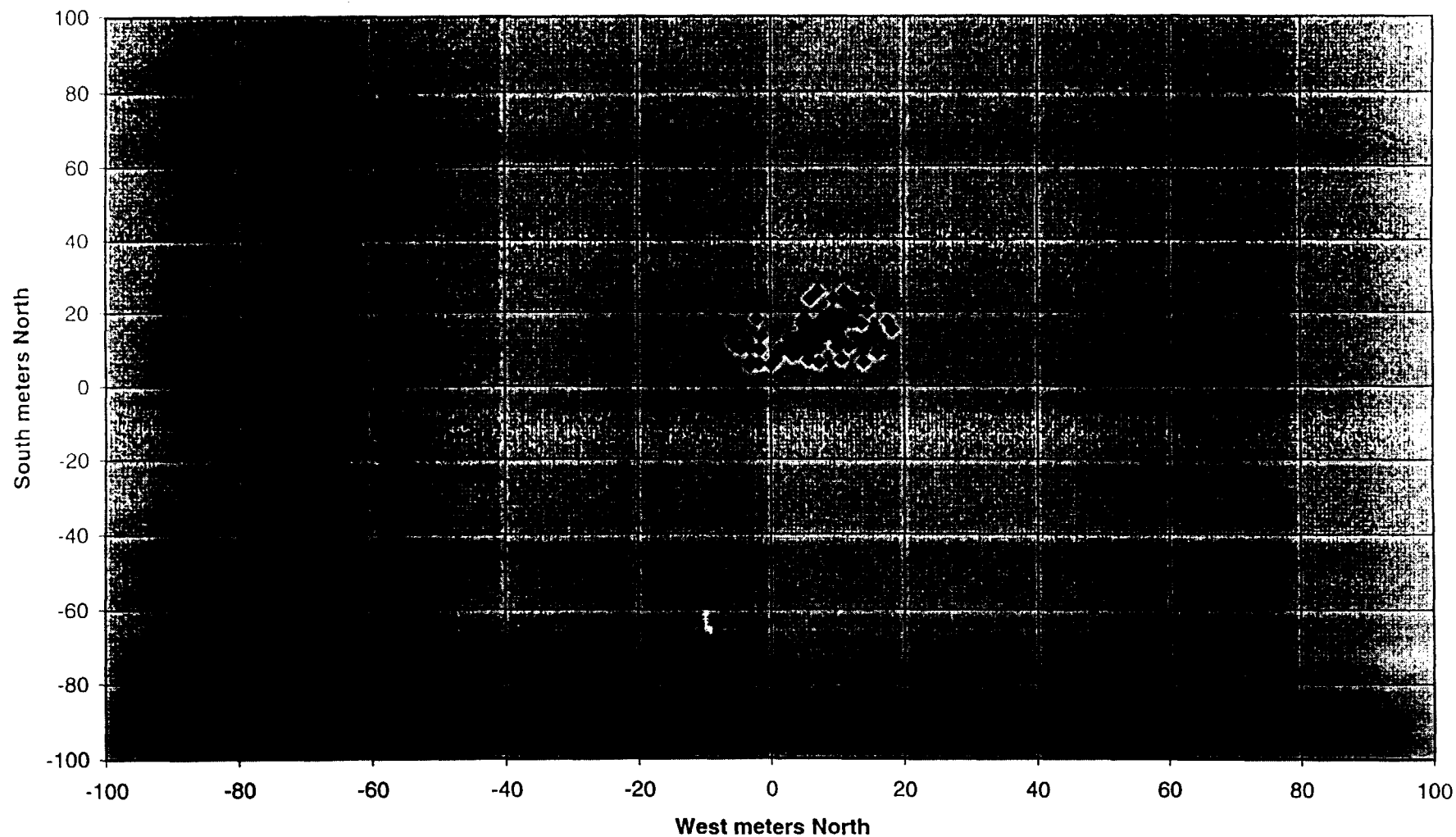
68.3 % Horizontal CEP: 21.0 Meters

95 % Horizontal Error: 35.0 Meters



Indoor, 2 story residence (wood frame)
3707 W 98th place, Westminster (Denver)
Test location #1, 1st floor interior hall

5 point averaging results
Yield: 102 of 102 (100 %)
68.3 % Horizontal CEP: 18.9 Meters
95 % Horizontal Error: 26.6 Meters



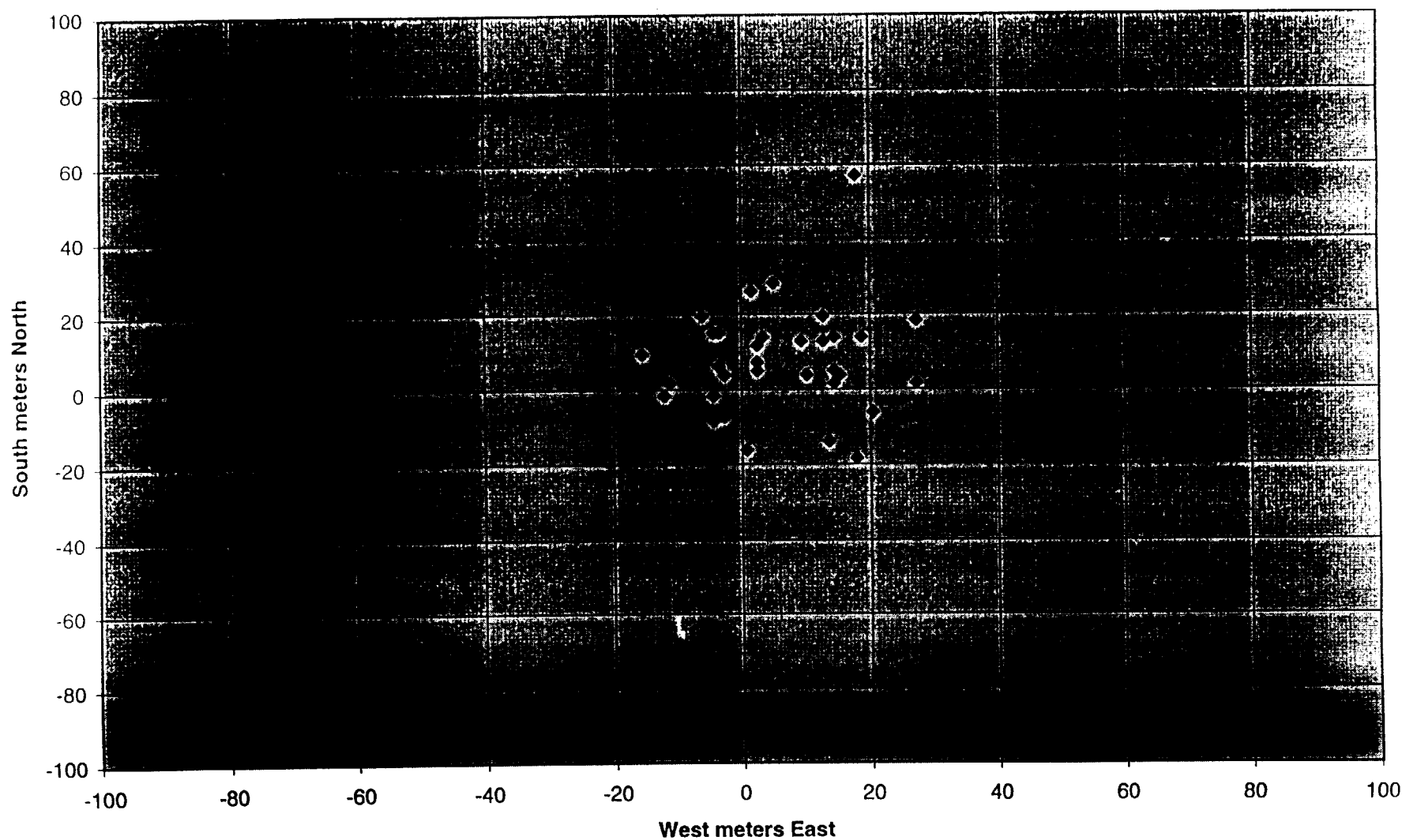


Indoor, 2-story residence (wood frame)

Photograph: Test Location #2, center of basement
Location: 3707 West 98th Place, Westminster (Denver)

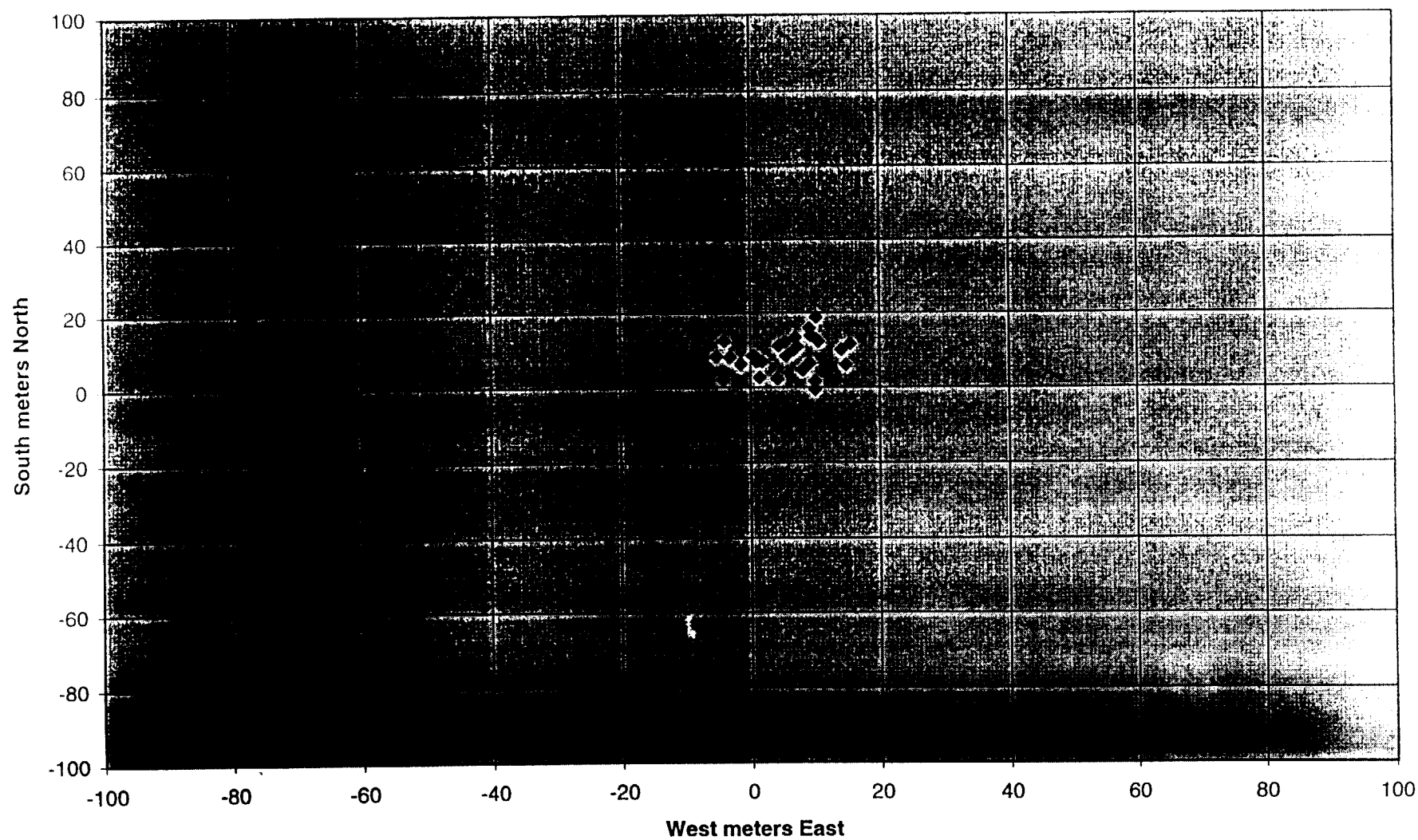
Indoor, 2 story residence (wood frame)
3707 W 98th place, Westminster (Denver)
Test location #2, center of basement

Single fix results
Yield: 33 of 33 (100 %)
68.3 % Horizontal CEP: 20.0 Meters



Indoor, 2 story residence (wood frame)
3707 W 98th place, Westminster (Denver)
Test location #2, center of basement

5 point averaging results
Yield: 29 of 29 (100 %)
68.3 % Horizontal CEP: 13.2 Meters

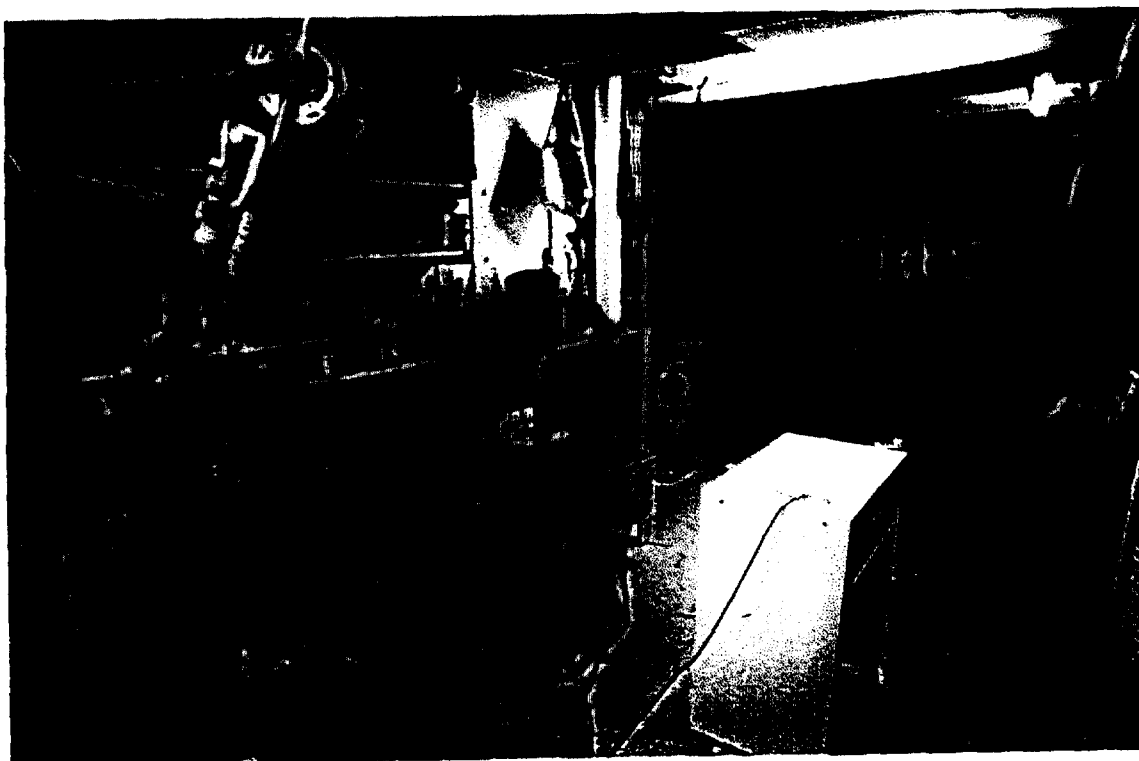




Indoor, 2-story residence (wood frame)

Photograph: exterior view

Location: 627 Marine, Boulder, Colorado



Indoor, 2-story residence (wood frame)

Photograph: test location in basement of 2-story section of residence

Location: 627 Marine, Boulder, Colorado

Indoor, 2 story residence (wood frame)

627 Marine, Boulder, Colorado

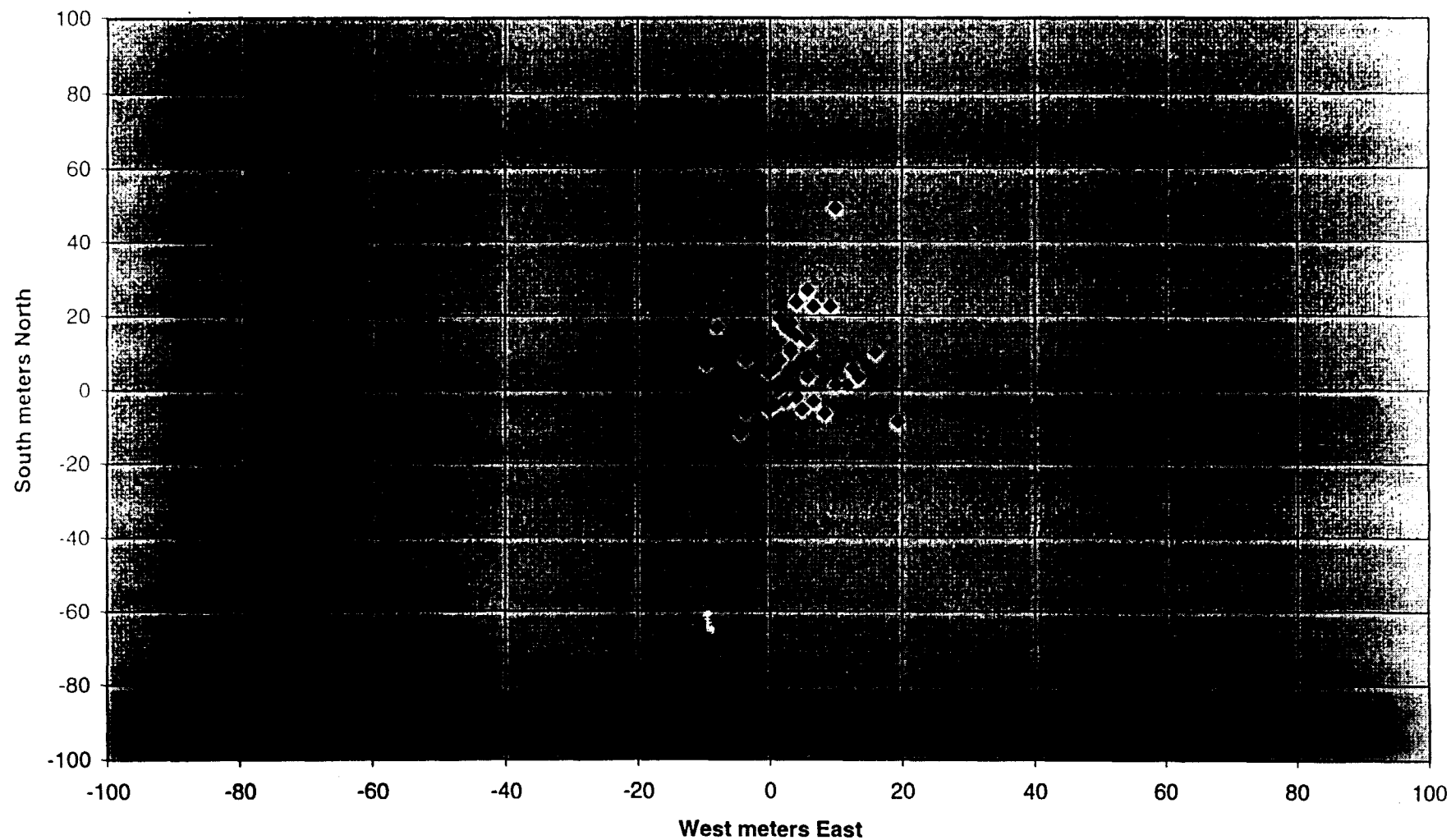
Center of basement

Single fix results

Yield: 36 of 37 (97%)

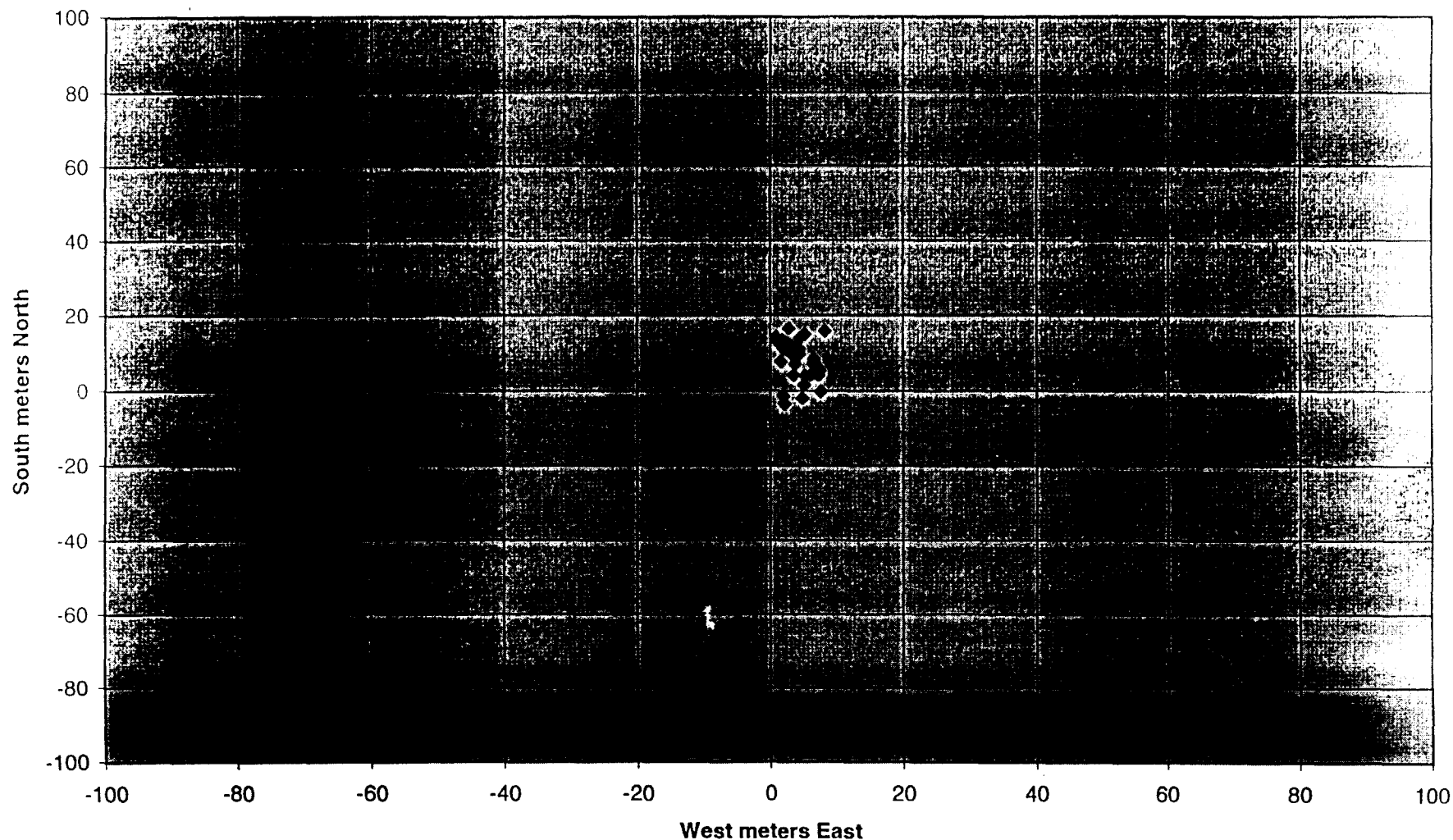
68.3% Horizontal CEP: 16.1 Meters

Max Horizontal Error: 50.1 Meters



Indoor, 2 story residence (wood frame)
627 Marine, Boulder, Colorado
Center of basement

5 point averaging results
Yield: 33 of 33 (100%)
68.3% Horizontal CEP: 12.0 Meters
Max Horizontal Error: 17.8 Meters





Indoor, 2-story office building (brick)

Photograph: exterior view

Location: 2045 Broadway, Boulder, Colorado



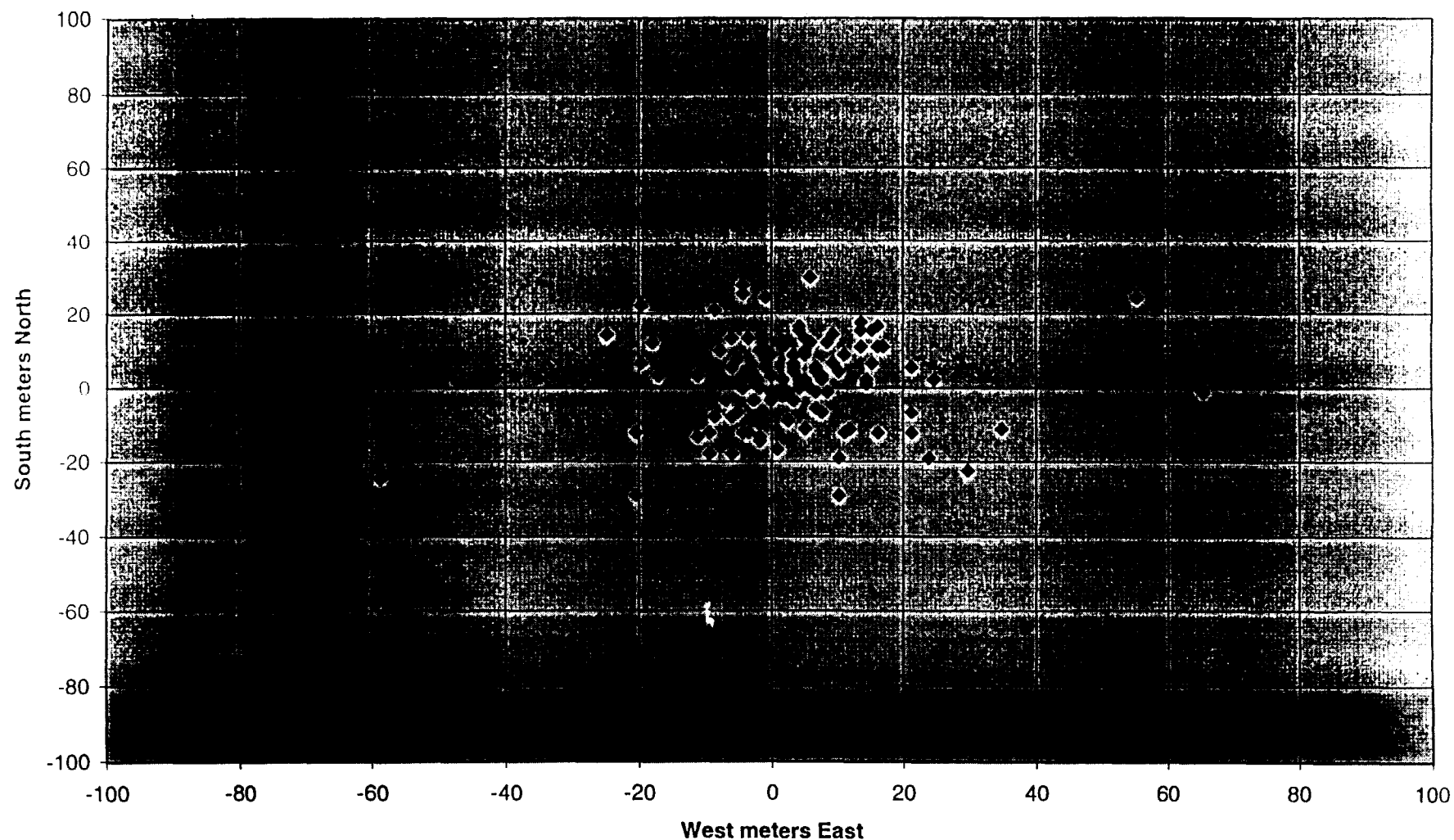
Indoor, 2-story office building (brick)

Photograph: Test Location #1, 2nd floor interior hallway in center of building

Location: 2045 Broadway, Boulder, Colorado

Indoor, 2 story office building (brick)
2045 Broadway, Boulder Colorado
Test location #1, 2nd floor interior hallway

Single fix results
Yield: 110 of 110 (100 %)
68.3% Horizontal CEP: 17.1 Meters
95.0 % Horizontal CEP: 35.5 Meters



Indoor, 2 story office building (brick)

2045 Broadway, Boulder Colorado

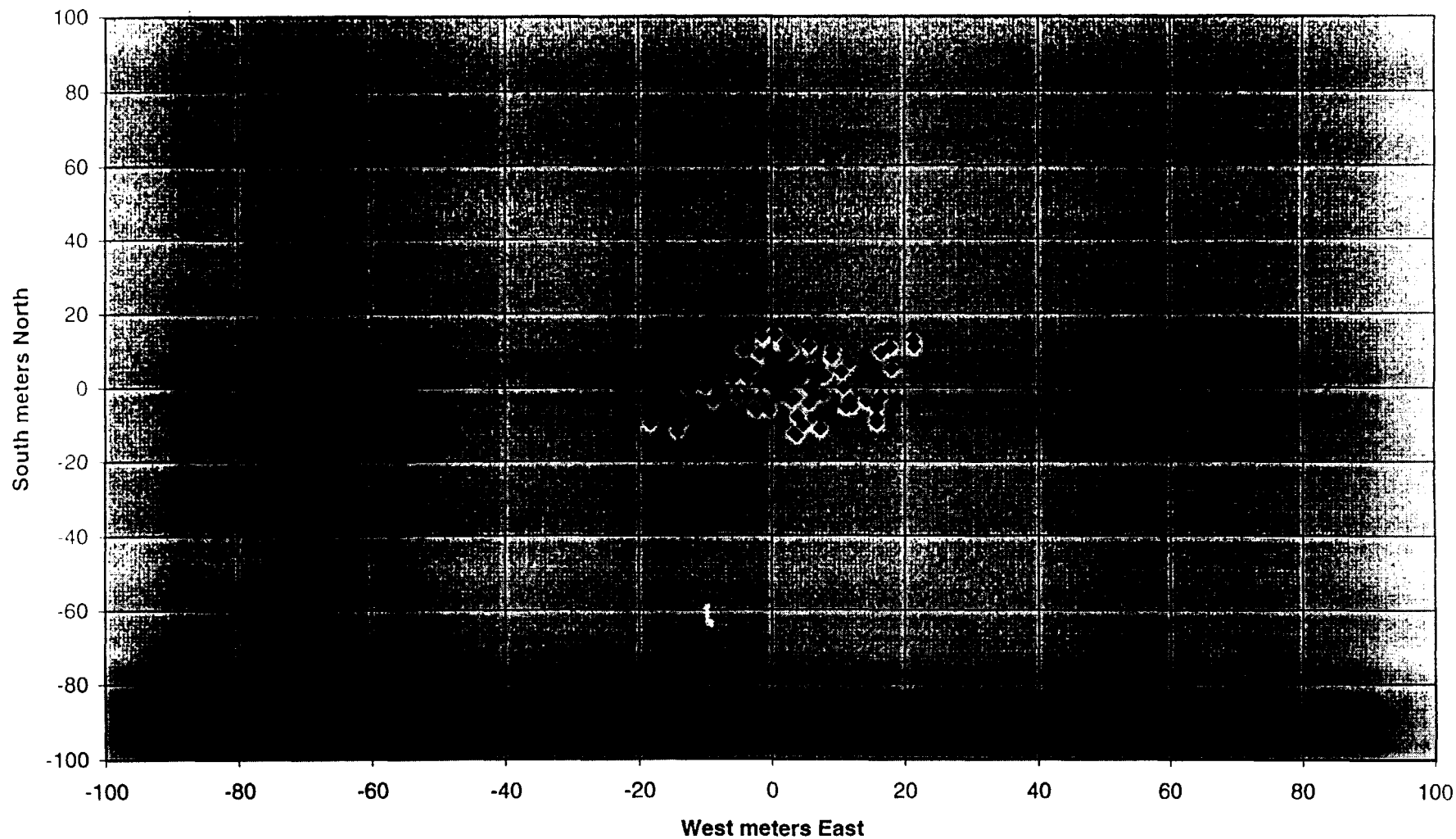
Test location #1, 2nd floor interior hallway

5 point averaging results

Yield: 106 of 106 (94 %)

68.3% Horizontal CEP: 11.3 Meters

95.0% Horizontal CEP: 18.7 Meters





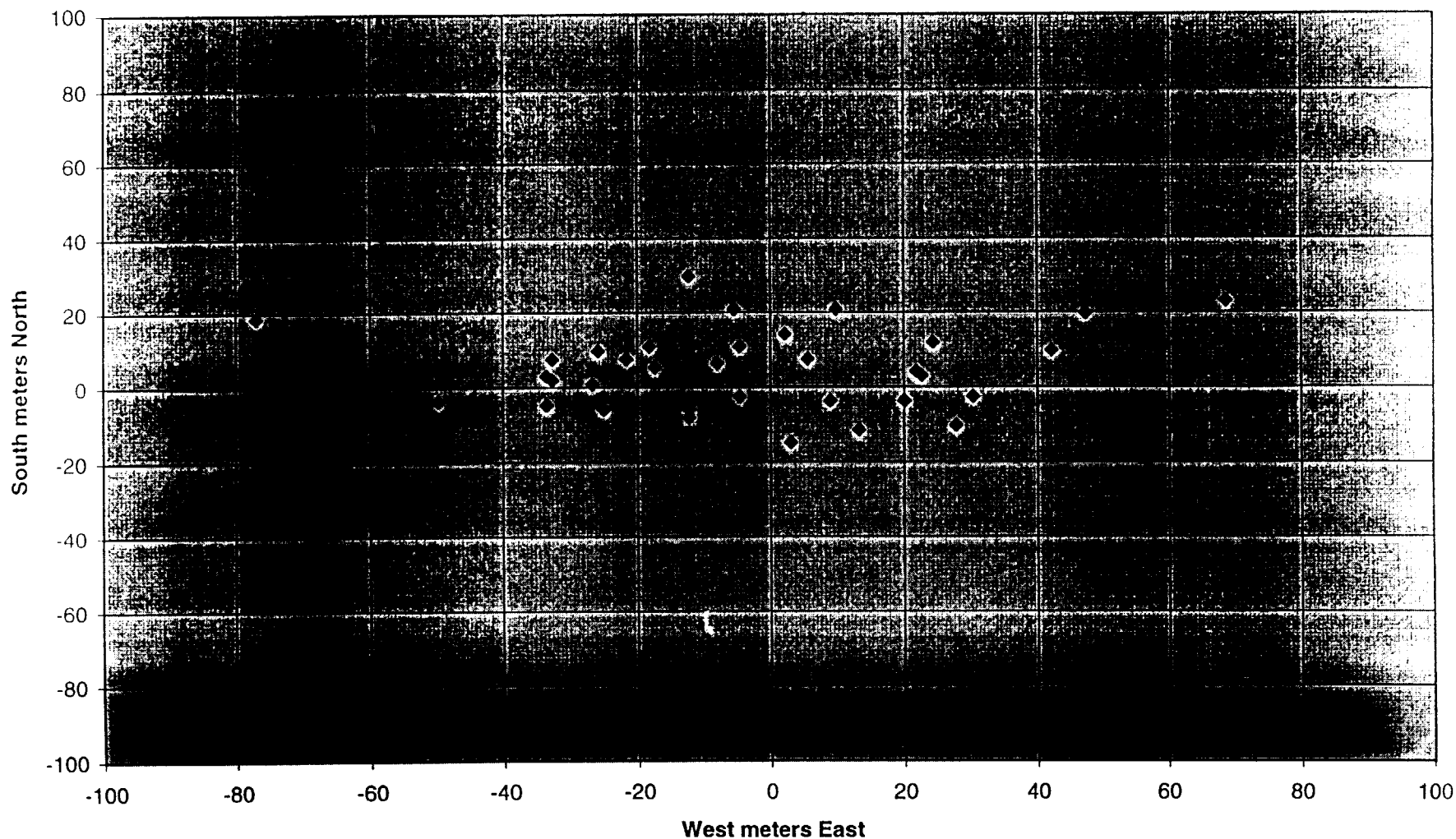
Indoor, 2-story office building (brick)

Photograph: Test Location #2, 1st floor interior room in center of building

Location: 2045 Broadway, Boulder, Colorado

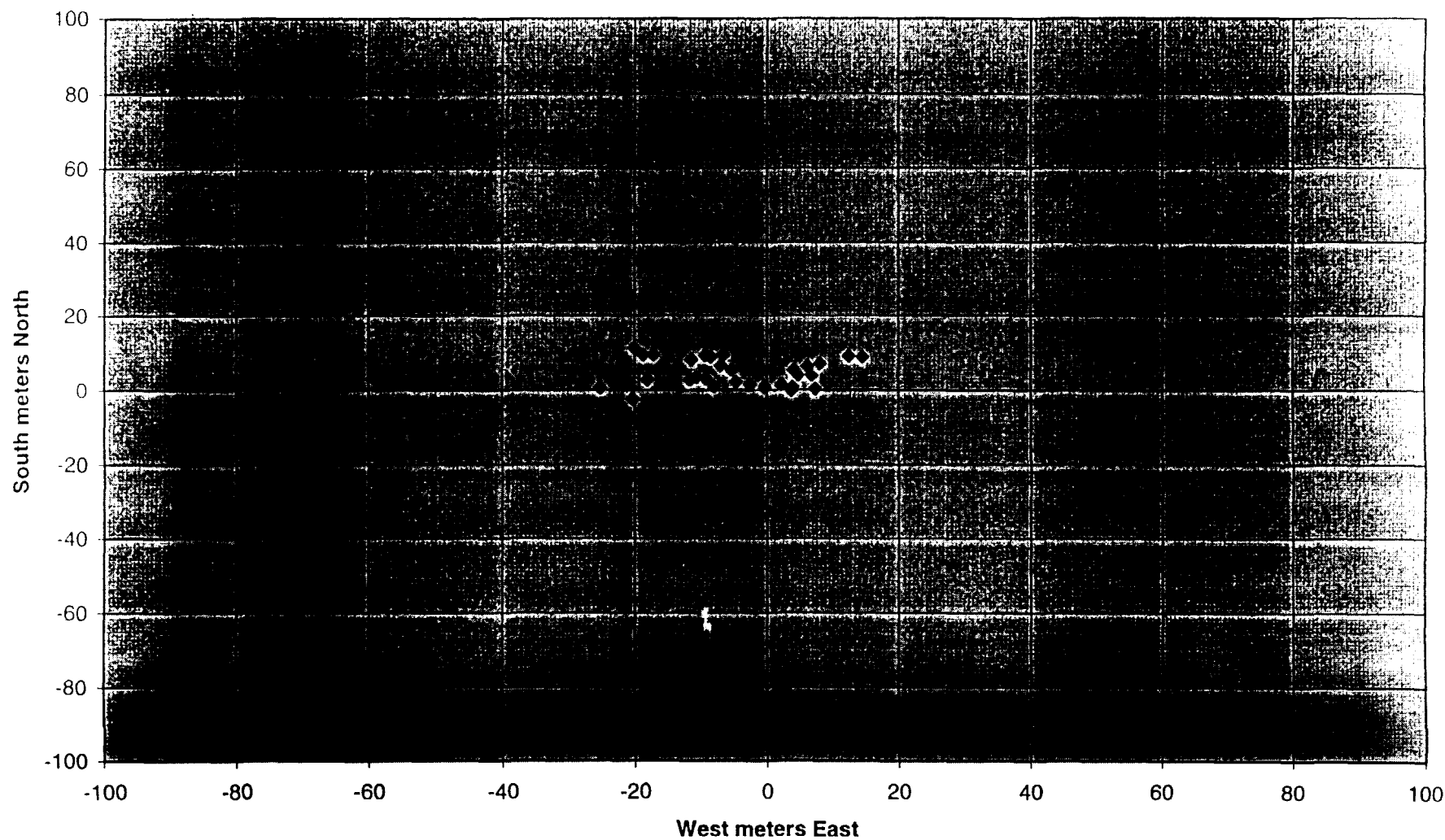
Indoor, 2 story office building (brick)
2045 Broadway, Boulder Colorado
Test location #2, 1st floor interior room

Single fix results
Yield: 34 of 36 (94 %)
68.3% Horizontal CEP: 22.1 Meters
Max Horizontal Error: 79.2 Meters



Indoor, 2 story office building (brick)
2045 Broadway, Boulder Colorado
Test location #2, 1st floor interior room

5 point averaging results
Yield: 32 of 32 (100 %)
68.3% Horizontal CEP: 13.2 Meters
Max Horizontal Error: 25.2 Meters





Indoor, shopping mall

Photograph: exterior view

Location: Westminster Mall, Denver



Indoor, shopping mall

Photograph: interior test location (inside walkway)
Location: Westminster Mall, Denver, Colorado

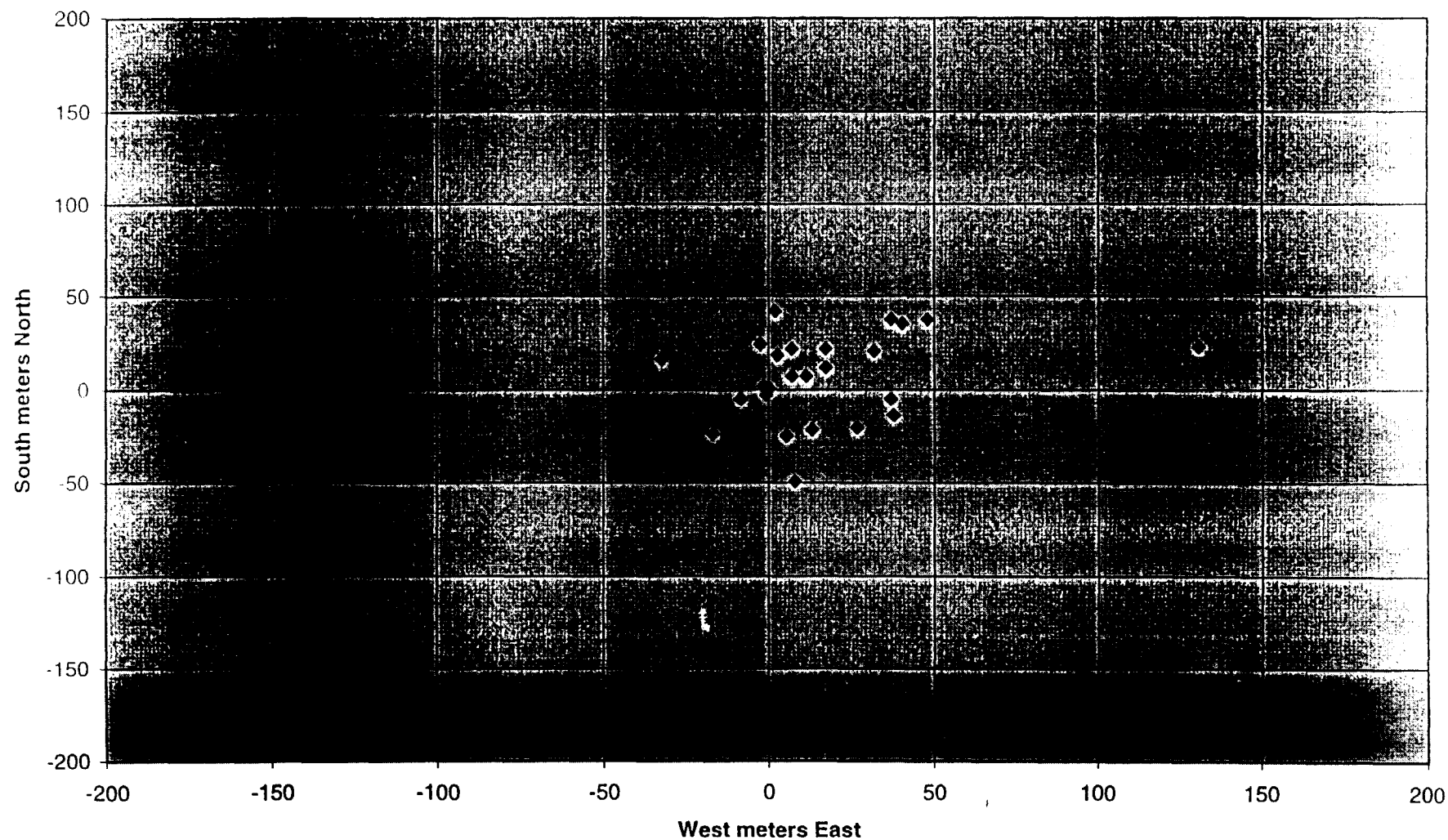
Indoor, Shopping Mall
Westminster Mall, Denver

Single fix results

Yield: 27 of 27 (100 %)

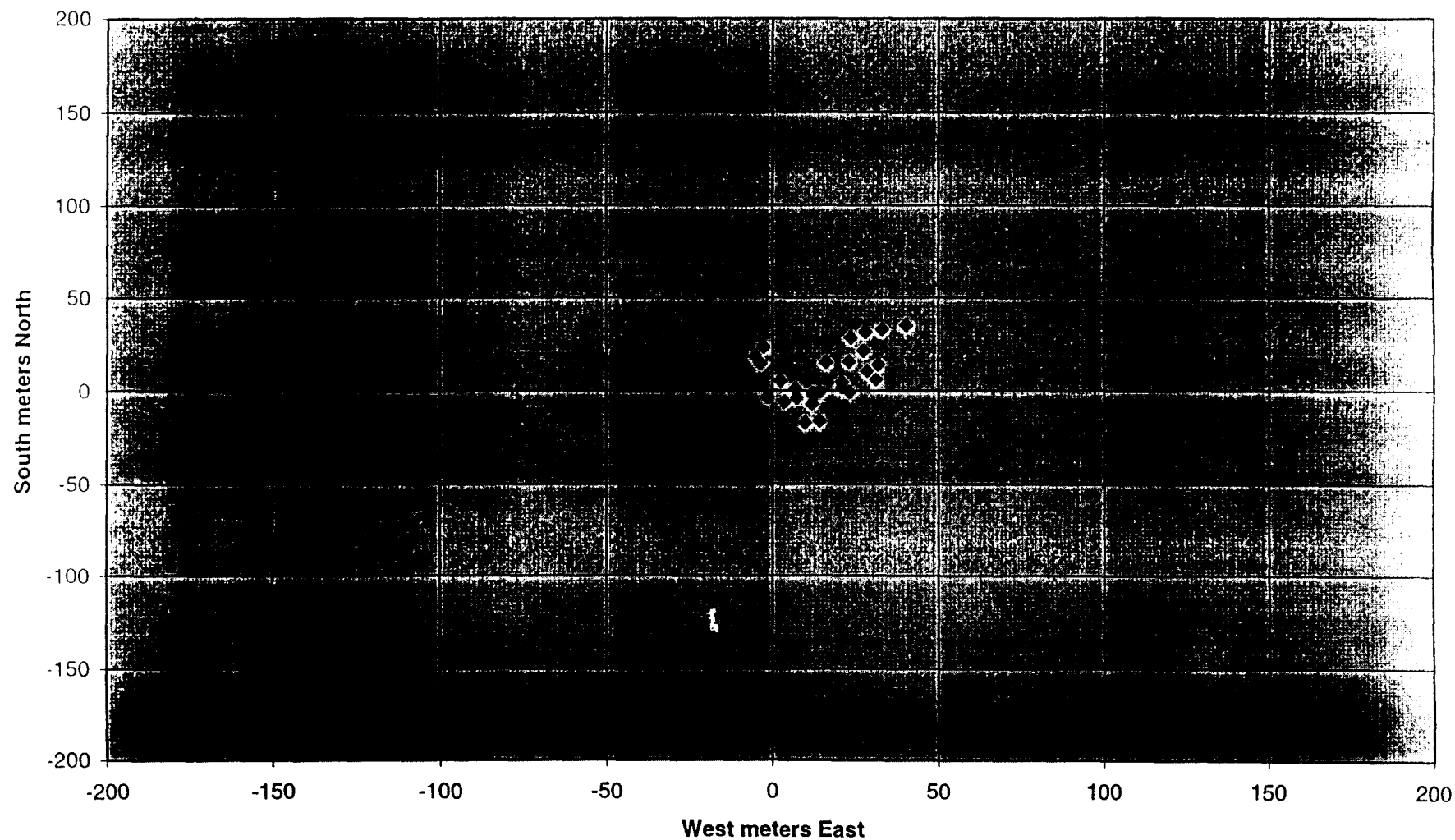
68.3% Horizontal error: 36.2 Meters

Max Horizontal error: 132.7 Meters



Indoor, Shopping Mall
Westminster Mall, Denver

5 point averaging results
Yield: 23 of 23 (100 %)
68.3% Horizontal error: 22.2 Meters
Max Horizontal error: 34.8 Meters





Indoor, shopping mall

Photograph: exterior view

Location: Aurora Mall, Aurora (Denver)